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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

MARTIN JONATHAN BATALLA VIDAL, *et al.*,

Plaintiffs,

v.

ELAINE C. DUKE, in her official capacity as  
Acting Secretary of Homeland Security, *et al.*,

Defendants.

No. 16-cv-4756 (NGG) (JO)

STATE OF NEW YORK, *et al.*,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as  
President of the United States, *et al.*,

Defendants.

No. 17-cv-5228 (NGG) (JO)

I, Steven A. Zalesin, of full age, under oath, hereby declare as follows:

1. I am an attorney in the State of New York and a partner at the law firm Patterson

Belknap Webb & Tyler LLP, attorneys for the *amici curiae* listed below. I respectfully

submit this Declaration in support of their Motion for Leave to File Memorandum of Law as *Amicus Curiae* in Support of Plaintiffs' Motions for Preliminary Injunctions.

2. Attached hereto as **Exhibit A** is the proposed Memorandum of Law Filed on Behalf of 87 Religious Organizations as *Amicus Curiae* in Support of Plaintiffs' Motions for Preliminary Injunctions.

3. Counsel working at my direction have requested consent to the filing of this motion from counsel for all parties, including Stephen M. Pezzi, Esq., counsel for Defendants; Marsha Chien, Esq., counsel for the State Plaintiffs; and Muneer I. Ahmad, Esq., counsel for the Class Plaintiffs. All parties have provided their consent.

I hereby declare that the foregoing statements made by me are true and that if any of the foregoing statements are willfully false, I am subject to punishment.

/s/ Steven A. Zalesin  
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Executed at New York, New York on December 22, 2014.